

To: The Commission.

In the instance of the bandwidth petition, RM-10740, I respectfully request the Commission dismiss the proposed rulemaking for both non-technical and technical reasons.

The petitioners appear to base a large measure of their petition principally upon their dissatisfaction with the manner in which a very small minority of stations operate with (in their opinions) excessive bandwidth. As such, the petitioners appear to be requesting the FCC attack the poor practices of a very few with additional regulatory requirements that affect all. A better way to handle this situation seems to be via enforcement and education.

The number of complaints to the FCC is also cited as support for the proposed rulemaking. It seems apparent that the need for rulemaking should be driven more correctly by the number of over-broad stations on the air, since radio spectrum use is the petitioners' concern. Further, the number of complaints submitted to the FCC is a statistic that is easily manipulated by any small group of radio amateurs, coordinated over the air and via the Internet, and hence should not of itself contribute great weight to the FCC's decisions.

It is not clear that the petition's request for precise specification of transmitted bandwidth, without reference to data rates, is in the best general interest of the amateur service, or even of the FCC enforcement offices. The lack of precise specifications that the petitioners decry actually can be seen as allowing for flexibility and compromise in the interest of promoting both good engineering practices and experimentation.

The precise specification of bandwidth limitations for only two modes as requested, rather than a call for standards for all emissions, further suggests the motivation for the petition lies more in vendetta against the two groups cited by the petitioners than in purely technical merits. The petitioners support their arguments with exaggerated scenarios in which amateur bands "continue to be reduced, perhaps to the point where emergency communications could be hampered or made impossible". This is merely an emotional plea, since the vast majority of licensees operate their stations as they were designed.

The petitioners' suggestion of add-on audio input bandpass filters as means to assure stations adhere to the 2.8 kHz regulations is ludicrous. They must surely realize that the 'splatter' which they often mention in their petition is not the result of the bandwidth of audio input but the result of improper modulation or amplification subsequent to the audio stages. They must also surely realize the difference between input bandwidth and output bandwidth and that their petition regulates output bandwidth, irrespective of the cause for it.

As the petitioners note, "the Commission has always considered the practicability of implementation when imposing limits and standards upon licensees." While limitations on audio input bandwidth are simple to effect, the petitioners have conveniently, for the sake of their case, overlooked the difficulties imposed upon every licensee to measure the emitted RF bandwidth.

I respectfully request the Commission reject this petition because it is overkill for a small problem, and because the burden upon all licensees to precisely monitor bandwidth at all times is excessive to the situation.

Respectfully submitted,

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